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December 19, 2022

VIA ECF

The Honorable Lewis A. Kaplan
United States District Court
Southern District of New York
Daniel Patrick Moynihan
500 Pearl Street
New York, New York 10007

Re: Carroll v. Trump, 22 Civ. 10016 (LAK)

Dear Judge Kaplan:

We write on behalf of Plaintiff E. Jean Carroll pursuant to Your Honor's Individual Rules of Practice to seek provisional approval to file an excerpt of the deposition of Defendant Donald J. Trump in redacted form. Exhibit B to the parties' Joint Discovery Plan filed today contains excerpts of both Plaintiff's and Defendant's depositions in *Carroll v. Trump*, No. 20 Civ. 7311. Both transcripts were marked confidential under the governing Protective and Confidentiality Order at the time of the respective deposition. Plaintiff has waived confidentiality in connection with that portion of her deposition that is being filed with the Court. Defendant has refused to do so and has requested that deposition excerpt be filed under seal.

In accordance with Your Honor's Individual Rules of Practice regarding sealed filings, Plaintiff has notified Defendant that it must file, within three days, a letter explaining the need to seal or redact the materials consistent with the presumption in favor of public access to judicial documents.

Respectfully submitted,



Roberta A. Kaplan

cc: Counsel of Record